

SHAWN N. ANDERSON 1 United States Attorney BENJAMIN K. PETERSBURG Assistant U.S. Attorney JUN 17 2020 Sirena Plaza, Suite 500 108 Hernan Cortez Avenue Hagåtña, Guam 96910 JEANNE G. QUINATA PHONE: (671) 472-7332 CLERK OF GOUR FAX: (671) 472-7215 5 6 Attorneys for the United States of America 7 IN THE UNITED STATES DISTRICT COURT 8 FOR THE TERRITORY OF GUAM 9 CRIMINAL CASE NO. 20-00017 UNITED STATES OF AMERICA, 10 Plaintiff, **INDICTMENT** 11 HARBORING ILLEGAL ALIENS [8 U.S.C. §§ 1324(a)(1)(A)(iii) and 12 VS. 1324(a)(1)(B)(i)(Counts 1 - 3) 13 TAKESHI HASEYAMA, NOTICE OF FORFEITURE 14 Defendant. [18 U.S.C. § 982(a)(6)] 15 THE GRAND JURY CHARGES: 16 **COUNT 1 - HARBORING ILLEGAL ALIEN** 17 Between on or about February 27, 2020 and March 17, 2020, in the District of Guam, the 18 defendant, TAKESHI HASEYAMA, knowing and in reckless disregard of the fact that an alien, 19 namely, Teruki Tanaka, had come to, entered, and remained in the United States in violation of 20 law, did conceal, harbor, and shield from detection such alien in buildings and other places for 21 the purpose of commercial advantage and private financial gain, in violation of Title 8, United 22 States Code, Sections 1324(a)(1)(A)(iii) and 1324(a)(1)(B)(i). 23 24

INDICTMENT- 1

COUNT 2 - HARBORING ILLEGAL ALIEN

Between on or about February 14, 2020 and March 17, 2020, in the District of Guam, the defendant, TAKESHI HASEYAMA, knowing and in reckless disregard of the fact that an alien, namely, Tomoya Nobuyoshi, had come to, entered, and remained in the United States in violation of law, did conceal, harbor, and shield from detection such alien in buildings and other places for the purpose of commercial advantage and private financial gain, in violation of Title 8, United States Code, Sections 1324(a)(1)(A)(iii) and 1324(a)(1)(B)(i).

COUNT 3 - HARBORING ILLEGAL ALIEN

Between on or about February 7, 2020 and March 17, 2020, in the District of Guam, the defendant, TAKESHI HASEYAMA, knowing and in reckless disregard of the fact that an alien, namely, Keng Wei Hu, had come to, entered, and remained in the United States in violation of law, did conceal, harbor, and shield from detection such alien in buildings and other places for the purpose of commercial advantage and private financial gain, in violation of Title 8, United States Code, Sections 1324(a)(1)(A)(iii) and 1324(a)(1)(B)(i).

NOTICE OF FORFEITURE

Pursuant to Title 18, United States Code, Section 982(a)(6), upon conviction of a violation of Title 8, United States Code, Sections 1324(a)(1)(A)(iii) and 1324(a)(1)(B)(i), as alleged above, the defendant, TAKESHI HASEYAMA, shall forfeit to the United States of America, any conveyance that has been used or is being used in the commission of the offense of which the defendant is convicted, any property real or personal that constitutes, or is derived from or is traceable to the proceeds obtained directly or indirectly from the commission of the offense of which the person is convicted, and any property real or personal that is used to INDICTMENT- 2

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facilitate, or is intended to be used to facilitate, the commission of the offense of which the person is convicted. DATED this 17th day of June, 2020. A TRUE BILL. SHAWN N. ANDERSON United States Attorney Districts of Guam and the NMI By: BENJAMIN K. PETERSBURG Assistant U.S. Attorney

INDICTMENT-3